

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH and ELCINDA  
PERSON, individually, and on behalf of all  
others similarly situated,

*Plaintiffs,*

v.

ADVANCED MARKETING &  
PROCESSING, INC. d/b/a PROTECT MY  
CAR, a Florida corporation,

*Defendant.*

Case No. 1:20-cv-706-JL

**DEFENDANT’S NOTICE OF  
SUPPLEMENTAL AUTHORITY  
RELATING TO MOTION TO  
COMPEL ARBITRATION AND TO  
DISMISS COMPLAINT, OR,  
ALTERNATIVELY, TO DISMISS  
THE COMPLAINT FOR LACK OF  
PERSONAL JURISDICTION (DE 12)**

Defendant, Advanced Marketing & Processing, Inc. d/b/a Protect My Car (“PMC”), by and through its undersigned counsel, hereby gives notice of supplemental authority relevant to PMC’s Motion to Compel Arbitration and to Dismiss Complaint, or, Alternatively, to Dismiss the complaint for Lack of Personal Jurisdiction filed September 1, 2020 (DE 12):

1. *Blanton v. Domino’s Pizza Franchising LLC*, 962 F.3d 842 (6th Cir. 2020), a copy of which is attached as **Exhibit “A”** to this Notice. In *Blanton*, the Court held that incorporation of the American Arbitration Association’s Commercial Rules in the subject arbitration agreement provided clear and unmistakable evidence that the parties agreed to arbitrate questions of arbitrability.

Dated: October 21, 2020

/s/ Steven J. Dutton  
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*Attorneys for Defendant, Advanced Marketing & Processing, Inc.*

\*Admitted *pro hac vice*.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 21, 2020, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system, which will send a notice of electronic filing to all counsel of record identified on the attached service list.

By: /s/ Steven J. Dutton  
Steven J. Dutton

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